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REED SMITH LLP
Timothy P. Law, Esq. (admitted *pro hac vice*)
1717 Arch Street
Three Logan Square, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
Facsimile: (215) 851-1420
E-mail: tlaw@reedsmith.com
*Special Insurance Counsel for Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,¹

Debtor.

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Chapter 11

Case No. 20-12345 (MG)

**FORTIETH MONTHLY STATEMENT OF REED SMITH LLP, AS SPECIAL INSURANCE
COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION, OF FEES FOR
PROFESSIONAL SERVICES RENDERED AND DISBURSEMENTS INCURRED FOR
THE PERIOD JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

Name of Applicant:

Reed Smith LLP

Authorized to Provide Professional Services
to:

Debtor and Debtor in Possession

Date of Retention:

Order entered on November 4, 2020,
nunc pro tunc to October 1, 2020

Period for which compensation and
reimbursement is sought:

January 1, 2024 to January 31, 2024

Amount of Compensation sought as actual,
reasonable and necessary:

\$318,555.00

¹ The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

	50% of which is \$159,277.50 ²
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$6,147.45
Fees and Expenses of Debtor's Consulting Expert ("Expert F&E")	\$167,776.17 ³
TOTAL (50% of fees, 100% of costs, 100% of Expert F&E)	\$333,201.12

Reed Smith LLP ("Reed Smith"), as Special Insurance Counsel for the Debtor and Debtor-In Possession, hereby submits this fortieth monthly statement (the "Monthly Statement") for the period of January 1, 2024 through January 31, 2024 (the "Statement Period") for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court's Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 129] (the "Fee Procedures Order"). Reed Smith requests: (a) interim allowance and payment of compensation in the amount of \$159,277.50 (50% of \$318,555.00) of fees on account of reasonable and necessary professional services rendered to the Debtor by Reed Smith, (b) reimbursement of actual and necessary costs and expenses in the amount of \$6,147.45 incurred by Reed Smith during the Statement Period, and (c) reimbursement for services rendered, and costs and expenses incurred, by Debtor's consulting expert in the amount of \$167,776.17.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Reed Smith professionals and paraprofessionals who provided services to the Debtor during the Statement Period, their respective

² Per Order Dated December 19, 2023 Regarding Holdback on Professional Fees (Dkt. No. 2743).

³ Submitted for payment pursuant to *Order Authorizing the Retention of Experts* [Dkt. No. 783], ¶ 3.

billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Debtor during the Statement Period.

Name	Title	Department	Office	JD Year	Rate	Hours	Amount
Javian, Aaron	Fix.Sh.Partner	Business and Finance	New York	2004	1280	10	\$ 1280.00
Kramer, Ann	Fix.Sh.Partner	Litigation	New York	1984	1480	44.4	\$65,712.00
Law, Timothy	Fix.Sh.Partner	Litigation	Philadelphia	1995	1330	49.8	\$66,234.00
Muha, Andrew	Fix.Sh.Partner	Litigation	Pittsburgh	2001	995	16	\$ 1592.00
Berringer, John	Counsel	Litigation	New York	1980	1370	85.3	\$ 16,861.00
Kim, Esther Y.	Associate	Litigation	Philadelphia	2018	765	416	\$31,824.00
LauKamg, Christopher	Paralegal	Business and Finance	New York	-	435	26.4	\$ 11,484.00
Simmonds, Lianna E.	Paralegal	Litigation	Philadelphia	-	380	19	\$ 722.00
Zygmund-Felt, Georgia A.	Paralegal	Litigation	Philadelphia	-	380	3.7	\$ 1406.00
Schad, James	Other	Litigation	Washington	-	640	33.5	\$21,440.00
						289.2	\$ 318,555.00
TOTAL:						289.2	\$ 318,555.00

2. The rates charged by Reed Smith for services rendered to the Debtor are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients as described in the engagement letter between Reed Smith and the Debtor. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A.**

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Reed Smith during the Statement Period in the course of representing the Debtor.

Description	Amount
Duplicating/Printing/Scanning	\$108.10
Gravity Stack January 2024 Invoice	\$4,944.45
USDC SDNY January 18, 2024 Hearing Transcript Expense	\$153.30
December 18, 2023 W. Chapin Deposition Transcript Expense	\$941.60
TOTAL:	\$6,147.45

NOTICE AND OBJECTION PROCEDURES

4. Reed Smith has provided notice of this statement upon the following parties by electronic or first class mail: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); and (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.).

5. Pursuant to the Fee Procedures Order, objections to this Monthly Statement, if any, must be served no later than March 6, 2024 (the “Objection Deadline”) upon the following parties: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.); and (v)

Special Insurance Counsel, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian, Esq. and John B. Berringer, Esq.) and Reed Smith LLP, 1717 Arch Street, Three Logan Square, Suite 3100, Philadelphia, PA 19103 (Attn: Timothy P. Law, Esq.).

6. If no objections to this Monthly Statement are received by the Objection Deadline, the Debtor will be authorized thereafter to pay Reed Smith 50% of the fees and 100% of the expenses identified in the Monthly Statement as well as 100% of the Expert F&E.

7. To the extent an objection to the Monthly Statement is received on or before the Objection Deadline, the Debtor will withhold payment of that portion of the Monthly Statement to which the objection is directed and is authorized to pay the remainder of fees and expenses in the percentages set forth above. To the extent such objection is not resolved, it shall be preserved and presented to the Court at the next interim or final fee application hearing to be heard in accordance with paragraph 2(k) of the Fee Procedures Order.

Dated: February 20, 2024
New York, New York

REED SMITH LLP

/s/ Aaron Javian

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John B. Berringer, Esq.
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E-mail: jberringer@reedsmith.com

-and-

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EXHIBIT A



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Tax ID # 25-0749630

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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3701670**
Invoice Date: **2/16/2024**
Client Number: **504893**
Matter Number: **504893.60005**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Chapter 11 Insurance Recovery

Total Current Fees.....	\$	312,751.00
Total Current Expenses and Other Charges	\$	<u>6,147.45</u>
Total Due This Invoice:	\$	<u>318,898.45</u>

Please Remit to:

Mail To:
Reed Smith LLP
P.O. Box 360110
Pittsburgh, PA 15251-6110

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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US - UNITED STATES

Invoice Number: **3701670**
Invoice Date: **2/16/2024**
Client Number: **504893**
Matter Number: **504893.60005**

RE: Chapter 11 Insurance Recovery

INVOICE SUMMARY

Total Current Fees.....	\$ 312,751.00
Total Current Expenses and Other Charges	\$ 6,147.45
Total Due This Invoice:	\$ 318,898.45

Please Remit to:

Mail To:
Reed Smith LLP
P.O. Box 360110
Pittsburgh, PA 15251-6110

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Invoice Number: **3701670**
Invoice Date: **2/16/2024**
Client Number: **504893**
Matter Number: **504893.60005**

DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH January 31, 2024

Date	Timekeeper	Description	Hours
01/02/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
01/02/24	C.M. LauKamg	Retrieve USBC SDNY docket for pleadings in preparation for the January 9, 2024 Hearing and circulate same to Attorneys.	1.00
01/02/24	C.M. LauKamg	Arrange USBC SDNY January 9, 2024 Hearing Appearances and circulate confirmations of same.	0.20
01/02/24	J.B. Berringer	Review emails re: Insurer response to Plaintiff Demands (.60); review emails re: Evanston deps (.40); review emails re: LMI subpoena and emails W. Chapin re: same (.40).	1.40
01/03/24	A. Kramer	Work in process call with client, JD, A&M and RS teams re: underlying cases, disclosure statement process etc. (1.0); review/revise draft status letter to J. Rochon re: Arrowood (.20); email exchange with LMI re: DS issues (.10); email exchange with Berringer and Law re: underlying case updates (.20).	1.50
01/03/24	A. Kramer	Conference call with JD and RS teams re: Arrowood liquidation.	0.50
01/03/24	J.B. Berringer	Team strategy call (1.0); t/c T. Law re: Arrowood meet and confer (.40); t/c re: confidentiality agreements (.50); t/c Jones Day, Parish counsel re: reporting issues (.80); meet and confer with Arrowood counsel (.80); review of EBT reports	4.60



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Date	Timekeeper	Description	Hours
		from parish counsel, t/c W. Chapin re: same (.90); email T. Law, A. Kramer re: same (.20).	
01/03/24	C.M. LauKamg	Retrieve USBC SDNY docket for pleadings in preparation for the January 9, 2024 and January 16, 2024 Hearings and circulate same to Attorneys.	1.00
01/03/24	T.P. Law	Email updates to Jones Day re: teleconferences with Arrowood and Committee insurance counsel.	0.30
01/03/24	T.P. Law	Draft joint status update to Judge Rochon in Arrowood proceedings.	3.40
01/03/24	T.P. Law	Send email to NY Liquidation Bureau re: confidentiality agreement.	0.20
01/03/24	T.P. Law	Telephone conference with Committee insurance counsel re: Arrowood liquidation issues.	0.40
01/03/24	T.P. Law	Meet and confer teleconference with A. Smith re: lifting of stay.	0.50
01/03/24	T.P. Law	Telephone conference re: Arrowood liquidation issues with Jones Day and Reed Smith teams.	0.50
01/03/24	T.P. Law	Participate in work in process call with Reed Smith and Jones Day teams.	1.00
01/04/24	G. A. Zygmund- Felt	Draft Stipulation for T. Law.	1.20
01/04/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
01/04/24	A.J. Muha	Review and analyze LMI objection to disclosure statement and prepare email memo to A. Kramer re: evaluation of certain issues raised in LMI objection.	1.60
01/04/24	J.B. Berringer	Review Emails re: [REDACTED], t/c [REDACTED] (.80); review of draft Joint Letter to Court, t/c , email T. Law re: same (2.1); review of Insurer Objections to Disclosure Statement, emails A. Kramer re: same (1.4); emails A.	6.00



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Date	Timekeeper	Description	Hours
		Kramer, T. Renker re: NDA (.40); prepare for, attendance on t/c [REDACTED] (.80); emails to [REDACTED] (.50).	
01/04/24	T.P. Law	[REDACTED].	0.60
01/04/24	T.P. Law	Begin draft stipulation for Receiver of Arrowood to sign.	0.40
01/04/24	T.P. Law	Finalize draft of joint letter to Judge Rochon and circulate to Arrowood's counsel.	2.20
01/04/24	A. Kramer	Zoom call with LMI and JD teams re: Disclosure Statement, Plan negotiations (.50); review LMI draft objections and email exchanges with Rosenblum, Berringer and Law re: same (.40); email exchange with Berringer, Law and Butler[REDACTED] (.20); review new Camden developments (.30); email exchange with JD re: same (.10).	1.50
01/05/24	J.B. Berringer	Review of draft Stipulation re: Arrowood receiver, A. Kramer email re: same (.60); email T. Law re: same (.10).	0.70
01/05/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
01/05/24	T.P. Law	Draft detailed update to C. Ball re: status of outstanding issues in insurance proceedings.	0.80
01/05/24	T.P. Law	Draft stipulation for Arrowood Receiver re: Arrowood proceeding and incorporate J. Berringer and A. Kramer edits.	2.80
01/05/24	A. Kramer	Review/revise draft Arrowood stipulation (.40); email exchange with T. Law re: same (.10).	0.50
01/06/24	T.P. Law	Finalize and send draft stipulation re: Arrowood Receiver to Arrowood's counsel.	0.40
01/08/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00



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Date	Timekeeper	Description	Hours
01/08/24	E. Y. Kim	Draft memorandum regarding status of Evanston and LMI matters for court status conference.	0.60
01/08/24	J.B. Berringer	Memo E. Kim re: outstanding discovery (.20); review of Insurer Objections to Disclosure Statement (1.5); review of Committee re: same (.90); review of email to W. Chapin re: Arrowood liquidation (.30).	2.90
01/09/24	A. Kramer	Review/revise Reply re: Disclosure Statement (2.6); review NYLB ancillary receiver motion (.30).	2.90
01/09/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar in preparation for the January 16, 2024 Hearing.	1.00
01/09/24	J.B. Berringer	Review voice message from J. Moffitt, telephone conference with J. Moffitt (.40); review Ancillary Receiver Petition, emails A. Kramer, T. Law re: same (.80); prep. for hearings re: LMI, Evanston (.80).	2.00
01/09/24	T.P. Law	Email Reed Smith and Jones Day teams re: ancillary liquidation petition filed in New York Supreme Court.	0.40
01/09/24	T.P. Law	Review ancillary liquidation petition filed in New York Supreme Court re: Arrowood liquidation.	0.70
01/09/24	T.P. Law	Follow up via email with Arrowood's counsel re: update on joint letter to Judge Rochon.	0.20
01/10/24	J.B. Berringer	Team work in process conference call to discuss status, strategy (1.30); prep for Court conf. calls in LMI, Evanston Adv. Proceedings (.80); Court conf. call in LMI Adv. Proceeding (.50); Court conf. re: Evanston Adv. Proceeding (.20); emails re: Evanston 30(b)(6)dep. (.20); review drafts of Joint Letter re: Arrowood, emails T. Law re: same (.90); emails E. Kim re: LMI 30(b)(6) deposition (.40); email A. Lundberg re: Petition for Ancillary Receiver (.20); review A. Smith email re: Joint Letter (.30); review Orders re: scope of	5.40



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Date	Timekeeper	Description	Hours
		discovery in LMI, Evanston Adv. Proceedings (.60).	
01/10/24	G. A. Zygmund-Felt	Respond to email from T. Law re: upcoming filing of Letter to Judge Rochon (.10); prepare exhibits with cover pages (.10); check judge's procedures re: status letters (.20); review final copy of letter and request minor edit from R. Gilson (.10); review updated copy and file (.20).	0.70
01/10/24	A. Kramer	Work in process call with client, JD, A&M and RS teams re: underlying cases, disclosure statement etc. (.90); review/revise joint status letter (.20).	1.10
01/10/24	C.M. LauKamg	Arrange USBC SDNY January 16, 2024 Hearing Appearances and circulate confirmations of same.	0.60
01/10/24	E. Y. Kim	Prepare for and attend call with T. Law, J. Berringer regarding status of Evanston and LMI actions (.60); emails with T. Law and J. Berringer regarding court Phase I discovery orders (.10).	0.70
01/10/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.40
01/10/24	T.P. Law	Follow up again via email with Arrowood's counsel re: update on joint letter to Judge Rochon.	0.20
01/10/24	T.P. Law	Zoom conference with J. Berringer and E. Kim to prepare for teleconference with Magistrate Cave.	0.40
01/10/24	T.P. Law	Revise and finalize joint status letter to Judge Rochon.	2.30
01/10/24	T.P. Law	Participate in teleconference with Judge Cave re: Evanston matter.	0.40
01/10/24	T.P. Law	Prepare for and participate in teleconference with Judge Cave re: LMI matter.	0.70
01/10/24	T.P. Law	Participate in work in process call with Jones Day and Reed Smith teams.	1.40



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Date	Timekeeper	Description	Hours
01/11/24	A. Kramer	Review/revise draft reply ISO Disclosure Statement.	2.60
01/11/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
01/11/24	T.P. Law	Review and provide comments on the Diocese's Omnibus reply to the objections filed with respect to the Debtor's Motion For an Order Approving Disclosure Statement and other objections.	0.90
01/11/24	J.B. Berringer	Telephone conferences with D. Artese re: Arrowood, emails Artese, T. Law re: same (1.2); telephone conference with E. Kim re: LMI, Evanston depositions (.40); review of Reply re Disclosure Statement Objections (.80); review of J. Bair email, T. Law re: same (.20).	2.60
01/11/24	E. Y. Kim	Communications with J. Berringer regarding LMI and Evanston depositions (.40); analyze LMI objections to 30(b)(6) notice for same (.20).	0.60
01/12/24	C.M. LauKamg	Revise USBC SDNY January 16, 2024 Hearing Appearances and circulate confirmations of same.	0.40
01/12/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
01/12/24	T.P. Law	Telephone call with insurance counsel for the Committee regarding Arrowood liquidation and other issues.	0.70
01/12/24	A. Kramer	Review/revise Exhibit B to reply to DS objections (2.1); teams call with B. Bair and RS Team (.60).	2.70
01/12/24	J.B. Berringer	Review of draft chart for Disclosure Statement Reply, email A. Butler re: same (.60); review of draft Case Report, email W. Chapin, T. Law re: same (.80); review of Committee Reply re: motion to declassify CVA docs (.50); t/c J. Bair, T. Burns re: Adv. Proceedings (.60); review of Court Order	2.80



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Date	Timekeeper	Description	Hours
		re: 1/18/2024 Conference, email C. LauKamg re: same (.30).	
01/14/24	E. Y. Kim	Draft preparation outline for Evanston 30(b)(6) deposition of the Diocese and analyze documents regarding same.	1.30
01/15/24	E. Y. Kim	Draft outline for LMI 30(b)(6) deposition and analyze documents regarding same.	2.20
01/16/24	L. E. Simmonds	Finalize and file Letter to Judge Rochon regarding 1/18/24 Video Conference Appearance List.	0.60
01/16/24	E. Y. Kim	Analyze documents for LMI 30(b)(6) deposition preparation and call with J. Berringer, J. Schad (2.2); draft outline for LMI 30(b)(6) deposition (1.8); draft preparation outline for Evanston 30(b)(6) deposition (1.9).	5.90
01/16/24	E. Y. Kim	Draft amended 30(b)(6) deposition notice to LMI (.20); communications with Veritext regarding LMI 30(b)(6) deposition preparation (.30); communications with J. Berringer regarding same (.60); call with J. Schad regarding strategy for LMI 30(b)(6) deposition and policy and claim documents (.70); call with J. Schad regarding Interstate and LMI policies (.40); emails with J. Berringer regarding Interstate policies and status of Interstate adversary proceeding (.30); draft initial letter to Interstate per J. Berringer's request (.30).	2.80
01/16/24	J.C. Schad	Prepare reports to J. Berringer re: Disclosure Statement facts (1.2); research policy provisions re: loss payments, policy exclusions to prepare discussions with E. Kim (3.4); attention to historic broker loss reports re: payment of loss for discussions with E. Kim (3.6).	8.20
01/16/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00



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Date	Timekeeper	Description	Hours
01/16/24	J.B. Berringer	Review of Jones Day questions re: Disclosure Statement Hearing (.20); review A. Kramer emails re: same (.60); review of Disclosure Statement (.90); emails, t/cs J. Schad re: same (.80); emails E. Kim re: Allianz (.40); attendance on Disclosure Statement Hearing (3.0).	5.90
01/16/24	A. Kramer	Attend DS Hearing and post-hearing discussions with JD team.	4.80
01/16/24	L. E. Simmonds	Draft letter to Judge Rochon regarding 1/18/24 Video Conference Appearance List.	1.30
01/16/24	T.P. Law	[REDACTED].	0.40
01/16/24	T.P. Law	Draft joint letter to Judge Rochon re: attendance at court conference.	1.80
01/17/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
01/17/24	J.C. Schad	Prepare reports, discussion with E. Kim, J. Berringer re: insurer deposition, discovery responses, potential exhibits (4.4); analyze materials re: liability limits, historic loss experience, 1977 tower of polices, insurer letters (1.2).	5.60
01/17/24	J.B. Berringer	Review trial counsel report re: Bilello case email T. Law re: same (.80); telephone conference with E. Kim, J. Schad re: Evanston, LMI deps (.70); review of 30(b)(6) outline (.80); emails E. Kim, T. Law re: same (.20); review Risk Trac docs (.60); revisions to Case Report (.90); review of insert into DS re: insurance risk (.80); email to W. Chapin re: Case Report (.40).	5.20
01/17/24	E. Y. Kim	Draft outline for Evanston 30(b)(6) deposition preparation (2.8); calls with J. Schad regarding same (1.2); analyze documents regarding same (.90); call with J. Berringer, J. Schad regarding documents and Evanston outline (.50).	5.40
01/17/24	A. Kramer	Review CBall outline re: DS (.30); work in	6.80



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Date	Timekeeper	Description	Hours
		process call with client, JD, A&M and RS teams (1.0); draft outline of insurance points for DS modification (5.3); revise same per Berringer and Law comments (.20).	
01/17/24	T.P. Law	Review and comment on document identifying risks relating to insurance for disclosure statement.	0.60
01/17/24	T.P. Law	Review defense counsel report and comment on status.	0.40
01/17/24	T.P. Law	Prepare for conference with Judge Rochon re: impact of Arrowood liquidation on SDNY proceeding.	2.80
01/17/24	T.P. Law	Participate in work in process call with Jones Day and Reed Smith teams.	1.10
01/18/24	J.C. Schad	Prepare reports, exhibits, statements re: LMI Bishops Program for depositions, discovery responses to insurers (2.4); review Mediation Statement materials (.60); report re: claim, loss summary materials (1.8).	4.80
01/18/24	C.M. LauKamg	Telephone and email to USDC SDNY Clerks Office and Court Reporter regarding retrieval status of the January 18, 2024 Case Management Conference Transcript and circulate status of same.	0.40
01/18/24	J.B. Berringer	Review docs from E. Kim for meeting with W. Chapin.	0.90
01/18/24	A. Kramer	Email exchange with Berringer re: underlying cases, Evanston policy (.30); email exchange with T. Law re: Arrowood hearing, next steps (.20).	0.50
01/18/24	E. Y. Kim	Draft outline for LMI 30(b)(6) deposition and analyze documents regarding same relating to the LMI policies, payment of losses and claim correspondence (4.3); revise preparation outline for Evanston 30(b)(6) deposition preparation (1.5); calls with J. Schad regarding same (.60).	6.40



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Date	Timekeeper	Description	Hours
01/18/24	T.P. Law	Participate in video conference with Judge Rochon re: impact of Arrowood liquidation on proceeding.	0.60
01/18/24	J.B. Berringer	Telephone conference W. Chapin re: reports to LMI (.30); revisions to LMI Reports (1.50); t/c B. Davey re: reporting to LMI (.50); prep for Court Conf. (.40); email to A. Magee re: LMI Reports (.20); prep. for meeting with W. Chapin (.60); emails re: same (.40); t/c Brooklyn Diocese counsel re: same (.40); t/c J. Schad, review of LMI policy re: limits (.80).	5.10
01/18/24	T.P. Law	Update NYLB re: status of the Arrowood adversary proceeding.	0.40
01/18/24	T.P. Law	Report to client and Jones Day via email re: Judge Rochon's decision to lift the liquidation stay.	0.40
01/18/24	T.P. Law	Prepare for conference with Judge Rochon to discuss impact of Arrowood liquidation.	3.40
01/19/24	E. Y. Kim	Emails with opposing counsel and Veritext regarding logistics of and exhibits for LMI 30(b)(6) deposition (.60); revise outlines for same and Evanston deposition (1.2).	1.80
01/19/24	J.C. Schad	Prepare graphic depictions, policy schedules for reports to E. Kim (1.8); discussions with E. Kim, J. Berringer re: historic program, secondary evidence, potential deposition exhibits (3.4); attention to historic archive documents re historic umbrella limits for reports to J. Berringer (.60).	5.80
01/19/24	J.B. Berringer	Prepare for, attendance at meeting with W. Chapin re: Evanston (5.0); review docs, draft memo to team re: Evanston attachment point (.80); emails E. Kim re: amendments to Responses to Evanston Interrogatories (.90).	6.70
01/20/24	J.B. Berringer	Emails W. Chapin, J. Schad re: Evanston attachment point.	0.60
01/21/24	E. Y. Kim	Emails with J. Berringer regarding LMI policies and claim correspondence to prepare for LMI	0.50



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Date	Timekeeper	Description	Hours
		deposition.	
01/21/24	J.B. Berringer	Prep. for LMI deposition.	4.50
01/22/24	E. Y. Kim	Prepare for LMI deposition and analyze exhibits regarding same (1.8); confer with J. Berringer regarding same (.50).	2.30
01/22/24	T.P. Law	Begin draft of joint letter to Magistrate Judge Cave re: status of Arrowood litigation.	1.90
01/22/24	T.P. Law	Draft long email to J. Berringer and E. Kim to prepare for next steps in Arrowood litigation.	0.80
01/22/24	T.P. Law	Emails with opposing counsel to prepare for next steps in Arrowood litigation.	0.30
01/22/24	J.C. Schad	Prepare schedule of claims trigger (2.3); attention to data, documents re: certain coverage position statements (.80); analyze data, documents re: coverage tower (.70).	3.80
01/22/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
01/22/24	G. A. Zygmund-Felt	Search for document for T. Law.	0.10
01/22/24	J.B. Berringer	Meeting, t/cs E. Kim re: LMI deposition (.80); review of docs, prep of outline for LMI deposition (3.7).	4.50
01/23/24	E. Y. Kim	Prepare for and attend LMI 30(b)(6) deposition (3.6); draft notes regarding LMI's deposition testimony (1.4); emails with opposing counsel, Veritext regarding deposition exhibits (.30); attention to bond requirement for non-admitted insurance companies per T. Law's request (1.3).	6.60
01/23/24	A. Kramer	Review/revise expert report.	3.80
01/23/24	T.P. Law	[REDACTED].	0.20
01/23/24	T.P. Law	Draft joint letter to Judge Cave re: status of Arrowood litigation and remaining discovery and	2.90



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Date	Timekeeper	Description	Hours
		send to opposing counsel.	
01/23/24	J.C. Schad	Attention to claim materials, trigger analysis, extract pertinent data, insurance information, prepare comprehensive schedule of claims, suits which trigger insurer policy for report to E. Kim and J. Berringer.	2.80
01/23/24	J.B. Berringer	Prep for, attendance at LMI 30(b)6 deposition (3.5); email B. Davey re: Case Reports (.30); review on draft letter to Judge Rochon (.40).	4.20
01/24/24	A. Kramer	Work in process call with JD, RS and A&M teams re: Steinman status, demands, Disclosure Statement etc.	0.90
01/24/24	T.P. Law	Attend work in process telephone conference with Reed Smith, Jones Day, and expert teams.	1.00
01/24/24	G. A. Zygmund-Felt	Assist R. Gilson re: documents from production.	0.10
01/24/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	1.00
01/24/24	J.B. Berringer	Team strategy call (1.0); t/c B. Davey re Case Reports (.80); emails C. Adams, W. Chapin re: Case Reports (.80); emails J. Moffitt re: LMI depositions (.50); review J. Bair email re: Plan Disclosure Statements(.40).	3.50
01/25/24	T.P. Law	Draft potential modifications to disclosure statement re: Arrowood insolvency issues.	1.70
01/25/24	T.P. Law	Telephone conference with Jones Day and Reed Smith teams re: disclosure statement issues raised by Committee.	1.00
01/25/24	A. Kramer	Review/analyze committee comments (2.1); email exchanges with Berringer and Law re: same (.20); teams call with C. Ball, B. Rosenblum, A. Butler and T. Law re: same (1.8); telephone calls with Berringer re: same (.20).	4.30
01/25/24	G. A. Zygmund-	Follow up with R. Gilson re: status of items from	0.20



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Date	Timekeeper	Description	Hours
	Felt	document production for binder assembly.	
01/25/24	G. A. Zygmund-Felt	Finish assembly of binder re: document productions.	0.30
01/25/24	J.B. Berringer	Review of Committee points re: Disclosure Statement (.80); review of draft responses to Committee Points (.50); t/cs A. Kramer re: LMI Service Organization provision (.80); emails J. Schad, A. Kramer re: same (.40); review draft response to Committee (.40).	2.90
01/25/24	J.C. Schad	Prepare report re: Insuring Conditions pursuant to discussions with J. Berringer.	0.30
01/25/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
01/26/24	E. Y. Kim	Revise Evanston discovery responses for J. Berringer's review (1.3); analyze additional documents for production to Evanston (.50).	1.80
01/26/24	T.P. Law	Email exchange with Jones Day re: disclosure statement issues.	0.30
01/26/24	T.P. Law	Telephone conference with Committee re: comments to disclosure statement.	1.50
01/26/24	T.P. Law	Telephone conference with A. Kramer and J. Berringer re: insurance aspects of Committee comments to disclosure statement.	0.80
01/26/24	J.B. Berringer	Telephone conference with A. Kramer, T. Law re: draft Disclosure Statement (.80); review E. Kim emails re: Evanston discovery (.60); review email, draft Case Report from B. Davey (.60); attendance on page turner re: Disclosure Statement (1.3).	3.30
01/26/24	A. Kramer	Analysis of insurance issues (1.1); Zoom call with Berringer and Law re: JD insurance questions (.80); teams call with Committee, JD and RS Teams re: DS Page turn (1.5).	3.40
01/26/24	J.C. Schad	Attention to prior work product for reports to E.	0.40



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Date	Timekeeper	Description	Hours
		Kim re: discovery responses.	
01/28/24	J.B. Berringer	Revisions to Evanston Interrogatory responses (1.2); telephone conference with E. Kim re: same (.80).	2.00
01/28/24	E. Y. Kim	Revise discovery responses to Evanston per J. Berringer's comments.	1.20
01/29/24	T.P. Law	Begin review of Arrowood denial letters re: specific claims.	0.90
01/29/24	T.P. Law	Follow up with Arrowood re: deposition scheduling.	0.20
01/29/24	T.P. Law	Review E. Stephens affidavit for applicability to insurance coverage actions.	0.70
01/29/24	C.M. LauKamg	Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.	0.80
01/29/24	G. A. Zygmund-Felt	Complete Document Production Binder for T. Law.	1.10
01/29/24	J.B. Berringer	Review of B. Davey Case Reports (.80); review of amended discovery responses re: Evanston (.80); t/cs A. Lundberg, A. Kramer re: [REDACTED] (.60).	2.20
01/29/24	E. Y. Kim	Amend discovery responses to Evanston and email opposing counsel regarding same.	0.80
01/30/24	J.B. Berringer	Review new outline for Evanston's 30(b)(6) deposition (.80); telephone conferences with E. Kim, W. Chapin re: same (.20); email Evanston counsel re: same (.20); email J. Moffett re: LMI deps (.20); review UST email re: Disclosure Statement, C. Ball reply (.30).	1.70
01/30/24	T.P. Law	Review coverage denial letters from Arrowood.	0.70
01/30/24	E. Y. Kim	Revise preparation outline for Evanston 30(b)(6) deposition of the Diocese.	0.70
01/30/24	A. Kramer	Review Plan and DS redlines filed on 1/29.	0.50



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01/31/24	J.B. Berringer	Team call re: demands to LMI, status of case (.70); t/cs W. Chapin re: deposition (.70); assembly of material re: Demand cases for A. Kramer (.90); emails Schad, Kramer re: same (.50); emails Evanston counsel, team re: deposition (.20).	3.00
01/31/24	J.B. Berringer	Assemble Case Reports for A. Kramer and emails with Kramer and Davey re: same.	0.70
01/31/24	T.P. Law	Draft revisions to joint letter to Judge Cave.	0.70
01/31/24	A. Kramer	Work in process call with Renker, JD, A&M and RS teams re: Glenn order, Steinman status, demand issues (.50); communications with J. Berringer and J. Schad re: demand issues (.40); analysis of demand claims (4.3); draft outline re: demand process for JD team (.70); email exchange with RS team re: same (.20).	6.10
01/31/24	T.P. Law	Attend work in process call with client and Jones Day and Reed Smith teams.	0.50
01/31/24	J.C. Schad	Identify, notate, record claimant materials for reports to J. Berringer and A. Kramer.	1.80
Total Hours			277.80

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Ann V. Kramer	44.40 hrs @ \$	1,480.00 / hr	65,712.00
John B. Berringer	85.30 hrs @ \$	1,370.00 / hr	116,861.00
Timothy P. Law	49.80 hrs @ \$	1,330.00 / hr	66,234.00
Andrew J. Muha	1.60 hrs @ \$	995.00 / hr	1,592.00
Esther Y. Kim	41.60 hrs @ \$	765.00 / hr	31,824.00
James C. Schad	33.50 hrs @ \$	640.00 / hr	21,440.00
Christopher LauKamg	16.00 hrs @ \$	435.00 / hr	6,960.00



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Georgia A. Zygmund-Felt	3.70 hrs @ \$	380.00 / hr	1,406.00
Lianna E. Simmonds	1.90 hrs @ \$	380.00 / hr	722.00
Total Professional Services			312,751.00

DISBURSEMENTS AND OTHER CHARGES

Date	Description	Amount
	Duplicating/Printing/Scanning	1,081.00 @ 0.10 108.10
01/06/2024	December 18, 2023 W. Chapin Deposition Transcript Expense	941.60
01/26/2024	USDC SDNY January 18, 2024 Hearing Transcript Expense	153.30
01/29/2024	Gravity Stack January 2024 Invoice	4,944.45
Total Expenses and Other Charges		6,147.45

INVOICE SUMMARY

Total Fees	\$ 312,751.00
Total Expenses and Other Charges	\$ 6,147.45
TOTAL CURRENT INVOICE DUE	\$ 318,898.45
Total Amount Due	\$ 318,898.45



Reed Smith LLP
599 Lexington Avenue
22nd Floor
New York, NY 10022
Telephone: +1 215 851 8100
Fax: +1 215 851 1420
Tax ID # 25-0749630

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R.C. Diocese of Rockville Centre
50 No. Park Avenue
Att: William G. Chapin
Rockville Centre, NY 11570
US - UNITED STATES

Invoice Number: **3701667**
Invoice Date: **2/16/2024**
Client Number: **504893**
Matter Number: **504893.60006**

REMITTANCE PAGE
PLEASE RETURN THIS COPY WITH YOUR PAYMENT

RE: Fee statements/fee applications

Total Current Fees.....\$ 5,804.00

Total Due This Invoice: \$ 5,804.00

Please Remit to:

Mail To:
Reed Smith LLP
Lockbox 10096
PO BOX 70280
Philadelphia, PA 19176-0280

Wire Instructions:
BNY Mellon Bank N.A.
Philadelphia, PA
ABA Number: 031000037
Swift Code: IRVTUS3N (International)
Account #2-022-986
(Please Reference Invoice Number)



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Client Number: **504893**
Matter Number: **504893.60006**

RE: Fee statements/fee applications

INVOICE SUMMARY

Total Current Fees.....	\$ <u>5,804.00</u>
Total Due This Invoice:	\$ <u>5,804.00</u>

Please Remit to:

Mail To:
Reed Smith LLP
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PO BOX 70280
Philadelphia, PA 19176-0280

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DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH January 31, 2024

Date	Timekeeper	Description	Hours
01/05/24	C.M. LauKamg	Prepare, review and revise USBC SDNY Certificate of No Objection for Reed Smith LLP Thirty-Eight Monthly Fee Statement and update master files and calendar.	0.40
01/08/24	C.M. LauKamg	Revise USBC SDNY Certificate of No Objection for Reed Smith LLP Thirty-Eighth Monthly Fee Statement and update master files and calendar.	0.20
01/08/24	C.M. LauKamg	Prepare, review and edit USBC SDNY Reed Smith LLP Thirty-Ninth Monthly Fee Statement in preparation for electronic filing.	1.50
01/11/24	C.M. LauKamg	Finalize, electronically file and serve USBC SDNY Certificate of No Objection for the November 2023 Reed Smith LLP Monthly Fee Statement and update master files and calendar.	0.80
01/16/24	C.M. LauKamg	Review USBC SDNY Reed Smith LLP Thirty-Ninth Monthly Fee Statement in preparation for electronic filing.	1.00
01/17/24	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-Ninth Monthly Fee Statement in preparation for electronic filing.	1.00
01/18/24	C.M. LauKamg	Email A. Ciriello of Alvarez and Marsal regarding October 2023 and November 2023 Reed Smith LLP Monthly Fee Statements.	0.20
01/22/24	C.M. LauKamg	Coordinate with Accounting Department regarding KCIC November 2023 Invoice Payment and arrange payment of same.	0.40
01/22/24	C.M. LauKamg	Revise USBC SDNY Reed Smith LLP Thirty-	0.80



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Date	Timekeeper	Description	Hours
		Ninth Monthly Fee Statement in preparation for electronic filing.	
01/22/24	A. Javian	Review/comment on December invoice.	0.50
01/24/24	C.M. LauKamg	Revise and finalize USBC SDNY Reed Smith LLP Thirty-Ninth Monthly Fee Statement in preparation for electronic filing.	1.70
01/24/24	C.M. LauKamg	Follow up with Accounting Department regarding KCIC November 2023 Invoice Payment and arrange Payment of same.	0.40
01/24/24	A. Javian	Review/comment on monthly fee statement.	0.50
01/25/24	C.M. LauKamg	Revise and finalize USBC SDNY Reed Smith LLP Thirty-Ninth Monthly Fee Statement in preparation for electronic filing.	0.20
01/25/24	C.M. LauKamg	Finalize, electronically file and coordinate service of USBC SDNY Reed Smith LLP Thirty-Ninth Monthly Fee Statement and update master files and calendar.	1.80
Total Hours			11.40

SUMMARY OF PROFESSIONAL SERVICES:

Timekeeper	Hours	Rate	Total
Aaron Javian	1.00 hrs @ \$	1,280.00 / hr	1,280.00
Christopher LauKamg	10.40 hrs @ \$	435.00 / hr	4,524.00
Total Professional Services			5,804.00

INVOICE SUMMARY

Total Fees	\$ <u>5,804.00</u>
TOTAL CURRENT INVOICE DUE	\$ <u>5,804.00</u>
Total Amount Due	\$ <u>5,804.00</u>